REMARKS

Applicant respectfully requests reconsideration and allowance of the present application in view of the above amendments and the following remarks.

In response to the objection to the use of "operable", applicant has amended claims 1 and 10 above.

Applicant gratefully acknowledges the examiners statement that claims 4, 5, 6, and 13-14 would be allowable if rewritten in independent form. The applicant has rewritten claims 4-5, 7, and 13-14 in independent form. Applicant requests allowance of claims 4, 5, 6, and 13-14.

In response to the rejection of claims 1-3, 6, and 8-12 under 35 USC 102(b) for allegedly being anticipated by Marmatsu (EP 1 067 535 A2), the examiner has not provided any reason that it would be obvious to combine these citations. In order to combine citations the examiner has to show some teaching or suggestion or motivation in the prior art or some reason for combining the citations. In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

All the claims are distinguished from the prior art, and applicant respectfully requests allowance of all the claims.

Please charge any fee deficiencies and credit any overpayments to Deposit Account No. 14-1270.

Respectfully submitted,

By /Michael E. Belk/ Michael E. Belk, Reg. 33,357 Senior Patent Attorney (914) 333-9643